

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

February 14 2024
By Ravi Subramanian, Clerk
Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

v.

BENNETT S. PARK,
Defendant.

NO. CR23-191 RSM

SUPERSEDING INDICTMENT

The Grand Jury charges that:

COUNT 1

(Production of Child Pornography)

In or about May 2023, in Snohomish County, within the Western District of Washington, and elsewhere, BENNETT S. PARK employed, used, persuaded, induced, enticed, and coerced a minor to engage in any sexually explicit conduct, and attempted to do so, for the purpose of producing any visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction will be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, such visual depiction was produced and transmitted using

1 materials that have been mailed, shipped, and transported in and affecting interstate and
2 foreign commerce by any means, including by computer, and such visual depiction has
3 actually been transported and transmitted using any means and facility of interstate and
4 foreign commerce and in and affecting interstate and foreign commerce and mailed.

5 All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

6 **COUNT 2**

7 **(Attempted Enticement of a Minor)**

8 Beginning on a date unknown and continuing until on or about August 8, 2023, in
9 Snohomish County, within the Western District of Washington, and elsewhere,
10 BENNETT S. PARK, used a means and facility of interstate and foreign commerce, to
11 include the internet and a cellular telephone, to knowingly persuade, induce, entice, and
12 coerce, and attempted to do so, Minor Victim 2 who had not attained the age of 18 years
13 to engage in sexual activity for which any person can be charged with a criminal offense.

14 All in violation of Title 18, United States Code, Section 2422(b).

15 **FORFEITURE ALLEGATION**

16 The allegations contained in Counts 1 and 2 of this Superseding Indictment are
17 hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

18 Upon conviction of the offense alleged in Count 1, BENNETT S. PARK shall
19 forfeit to the United States, pursuant to Title 18, United States Code, Section 2253(a), all
20 property used to commit or to facilitate commission of the offense, any proceeds of the
21 offense, and any data files consisting of or containing visual depictions within the
22 meaning of Title 18, United States Code, Section 2253(a)(1).

23 Upon conviction of the offense alleged in Count 2, BENNETT S. PARK, shall
24 forfeit to the United States, pursuant to Title 18, United States Code, Section 2428(a), any
25 property used to commit or to facilitate the commission of the offense, any proceeds of
26 the offense, and any property derived from such proceeds.

27 //

1 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
2 any act or omission of the defendant,

- 3 a. cannot be located upon the exercise of due diligence;
4 b. has been transferred or sold to, or deposited with, a third party;
5 c. has been placed beyond the jurisdiction of the Court;
6 d. has been substantially diminished in value; or,
7 e. has been commingled with other property which cannot be divided
8 without difficulty,

9 it is the intent of the United States to seek the forfeiture of any other property of the
10 defendant, up to the value of the above-described forfeitable property, pursuant to
11 Title 21, United States Code, Section 853(p).

12
13 A TRUE BILL:

14 DATED: 2/14/24

15 *Signature of Foreperson redacted pursuant*
16 *to the policy of the Judicial Conference of*
17 *the United States.*

18 _____
19 FOREPERSON

18 
19 _____
20 TESSA M. GORMAN
21 United States Attorney

21 
22 _____
23 MARCI L. ELLSWORTH
24 Assistant United States Attorney

24 
25 _____
26 CECELIA GREGSON
27 Assistant United States Attorney